

EXHIBIT I

barry.ingberlawfirm@gmail.com

From: Raymond, Peter D. <PRaymond@ReedSmith.com>
Sent: Monday, April 29, 2019 12:03 PM
To: ingber.lawfirm@gmail.com; Kadosh, Samuel; Berman, Jeremy A.
Cc: asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: RE: Luis Ignacio Salazar Deposition

Mark—I think you misinterpreted Jeremy’s email. He was referring to the reporter’s transcript of the deposition, not a transcript of the audio. Neither we nor anyone else has listened to the audio or made any transcript of it. Jeremy was just repeating what we told you during the second day of the deposition, which was that we would be reviewing the court reporter’s transcript of the deposition to ensure that there were no errors in the translation before deciding if there was any need for the audio tape.

Accordingly, there have been and will be no ethical violations with respect to the audiotape, which will likely be destroyed once we confirm there were no translation errors..

While not relevant given these facts, your paralegal took control of the on/off switch for the audio buy apparently neglected to turn it off on the second day during one or more of the breaks in the deposition.

Regards,

Peter

From: ingber.lawfirm@gmail.com <ingber.lawfirm@gmail.com>
Sent: Monday, April 29, 2019 10:22 AM
To: Kadosh, Samuel <SKadosh@ReedSmith.com>; Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: RE: Luis Ignacio Salazar Deposition
Importance: High

EXTERNAL E-MAIL

Sam,

As it was your Firm that requested the audio, it was your Firm that had an obligation to ensure that it was turned on when we were on the record and off when we weren’t. This clearly did not happen. Moreover, you were not there when I spoke with Peter and Jeremy about this issue after the deposition, whereby they told me that they didn’t expect to need the audio and would let us know in a day if they would delete the audio. We also agreed that in any circumstance, you would not disseminate the audio which contained inadmissible and confidential communications (much like an inadvertent email) in any way without our agreement.

It is now more than 2 weeks since the deposition and in view of your below email and position. it appears that you may have already listened to and disseminated the video.

As a Member of the NJ Ethics Committee, such action would be a grievous violation of RPC 4.4. Accordingly, we want to have a Meet and Confer on this today. Please advise of your availability.

Regards,

Mark J. Ingber, Esq.
The Ingber Law Firm
51 JFK Parkway
First Floor West, Suite 159
Short Hills, NJ 07078
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US IMMEDIATELY BY TELEPHONE SO THAT WE CAN
ARRANGE FOR THE RETURN OF THE ORIGINAL DOCUMENTS
TO US AT NO COST TO YOU.

From: Kadosh, Samuel <SKadosh@ReedSmith.com>
Sent: Monday, April 29, 2019 9:25 AM
To: ingber.lawfirm@gmail.com; Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; asha.ingberlawfirm@gmail.com;
barry.ingberlawfirm@gmail.com
Subject: RE: Luis Ignacio Salazar Deposition
Importance: High

Mark,

We will not agree to any such limitation. We notified you in advance that we were audiotaping the deposition in order to verify the accuracy of the translation. You did not object.

Best
Sam

Sent with BlackBerry Work (www.blackberry.com)

From: ingber.lawfirm@gmail.com
Sent: Apr 29, 2019 9:18 AM
To: "Berman, Jeremy A." <JBerman@reedsmith.com>
Cc: "Raymond, Peter D." <PRaymond@ReedSmith.com>; "Kadosh, Samuel" <SKadosh@ReedSmith.com>;
asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: RE: Luis Ignacio Salazar Deposition

EXTERNAL E-MAIL

Jeremy,

Please confirm that neither your Firm, nor your clients, nor anyone else will transcribe the audio of the deposition, listen to the audio or do anything else with the audio until such time as your Firm either confirms that it has been deleted/erased or until such time as there is either a court order or agreement between the parties governing the audio, as was done with Network Solutions.

Regards,

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From: Berman, Jeremy A. <JBerman@reedsmith.com>
Sent: Monday, April 29, 2019 8:59 AM
To: ingber.lawfirm@gmail.com
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>;
asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: RE: Luis Ignacio Salazar Deposition

Mark,

We will not make a decision regarding deleting the recording until we have reviewed the transcript with our client.

Best,

Jeremy

From: ingber.lawfirm@gmail.com <ingber.lawfirm@gmail.com>
Date: Friday, Apr 26, 2019, 3:30 PM
To: Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>;
asha.ingberlawfirm@gmail.com <asha.ingberlawfirm@gmail.com>, barry.ingberlawfirm@gmail.com
<barry.ingberlawfirm@gmail.com>
Subject: RE: Luis Ignacio Salazar Deposition

EXTERNAL E-MAIL

Urgent Reminder- Please get back to me on whether you will be deleting the audio tape of the deposition.

From: ingber.lawfirm@gmail.com <ingber.lawfirm@gmail.com>

Sent: Saturday, April 13, 2019 10:32 AM

To: 'Berman, Jeremy A.' <JBerman@reedsmith.com>

Subject: RE: Luis Ignacio Salazar Deposition

Hi Jeremy,

Please get back to me on whether you will be deleting the audio tape of the deposition.

Thanx.

Regards,

Mark J. Ingber, Esq.

The Ingber Law Firm

51 JFK Parkway

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US IMMEDIATELY BY TELEPHONE SO THAT WE CAN
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From: Berman, Jeremy A. <JBerman@reedsmith.com>

Sent: Wednesday, April 10, 2019 2:49 PM

To: ingber.lawfirm@gmail.com

Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>

Subject: Luis Ignacio Salazar Deposition

Mark,

Please confirm that the deposition will begin at 10:00 am tomorrow. Also, please let us know who will be attending with you so that we can give their names to building security.

The deposition will take place in room 22-7 on both days, and room 22-5 has been reserved for you as a breakout room for both days.

Best,

Jeremy Berman

212.549.4241

JBerman@reedsmith.com

ReedSmith LLP

599 Lexington Ave | New York | NY | 10022

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* * *

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